

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALEX LORA,  
Plaintiff

v.

PATRICK K. MORAN, Individually,  
JON KACHADOORIAN, Individually,  
and CITY OF WORCESTER,  
Defendants

C.A. No. 13-40131-TSH

**DEFENDANTS' ASSENTED TO MOTION FOR LEAVE  
TO DEPOSE A PERSON CONFINED IN PRISON**

Defendants, Patrick K. Moran, Jon Kachadoorian and City of Worcester (City), with the assent of Plaintiff, respectfully move this Court, pursuant to Fed. R. Civ. P. 30(a)(2), for leave to depose Jimmie Cotto, Jr., who has been identified in Plaintiff's initial disclosures as a potential witness present at the time of the incident alleged in Plaintiff's First Amended Complaint, and who is currently incarcerated at the Worcester County Jail and House of Correction, West Boylston, MA.

PATRICK K. MORAN,  
JON KACHADOORIAN &  
CITY OF WORCESTER  
By their attorneys,  
David M. Moore  
City Solicitor

/s/ Kevin M. Gould

Wendy L. Quinn (BBO #653954)

Kevin M. Gould (BBO #661545)

Assistant City Solicitors

City Hall, Room 301

455 Main Street

Worcester, MA 01608

(508) 799-1161

quinnwl@worcesterma.gov

gouldk@worcesterma.gov

**ASSENTED TO BY:**

ALEX LORA

By his attorney

/s/ Jeffrey M. Sankey

Jeffrey M. Sankey, BBO# 551062

Sankey Law Offices

25 Braintree Hill Park, Suite 200

Braintree, MA 02184

(781) 930-3127

jsankey@sankeylaw.com

**CERTIFICATE OF LOCAL RULE 7.1 CONFERENCE**

I, the undersigned, hereby certify that I have communicated with Plaintiff's counsel in a good faith attempt to resolve or narrow the issues presented by this Motion, as a result, this motion is filed with Plaintiff's assent.

/s/ Kevin M. Gould

Kevin M. Gould

Assistant City Solicitor

**CERTIFICATE OF SERVICE**

I, Kevin M. Gould, hereby certify that on this 1st day of October, 2014, the within Defendants' Assented to Motion for Leave to Depose a Person Confined in Prison was served upon all counsel of record through this Court's electronic filing system as identified on the Notice of Electronic Filing.

/s/ Kevin M. Gould

Kevin M. Gould

Assistant City Solicitor